

<i>SERFF Tracking Number:</i>	<i>INGD-126976016</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING Life Insurance and Annuity Company</i>	<i>State Tracking Number:</i>	<i>47655</i>
<i>Company Tracking Number:</i>	<i>E-RO457-11</i>		
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-RO457-11</i>		
<i>Project Name/Number:</i>	<i>E-RO457-11/E-RO457-11</i>		

## Filing at a Glance

Company: ING Life Insurance and Annuity Company

Product Name: E-RO457-11	SERFF Tr Num: INGD-126976016	State: Arkansas
TOI: A02.1G Group Annuities - Deferred Non-Variable and Variable	SERFF Status: Closed-Approved-Closed	State Tr Num: 47655
Sub-TOI: A02.1G.002 Flexible Premium	Co Tr Num: E-RO457-11	State Status: Approved-Closed
Filing Type: Form		Reviewer(s): Linda Bird
	Authors: Nancy Pare, Patricia Smith, Melissa Cheyney	Disposition Date: 01/14/2011
	Date Submitted: 01/07/2011	Disposition Status: Approved-Closed
Implementation Date Requested: On Approval		Implementation Date:

State Filing Description:

## General Information

Project Name: E-RO457-11	Status of Filing in Domicile: Pending
Project Number: E-RO457-11	Date Approved in Domicile:
Requested Filing Mode: Review & Approval	Domicile Status Comments: Our domiciliary state of Connecticut has been filed simultaneously and is pending approval.
Explanation for Combination/Other:	Market Type: Group
Submission Type: New Submission	Group Market Size: Small and Large
Group Market Type: Employer	Overall Rate Impact:
Filing Status Changed: 01/14/2011	
State Status Changed: 01/14/2011	Deemer Date:
Created By: Melissa Cheyney	Submitted By: Melissa Cheyney
Corresponding Filing Tracking Number:	
Filing Description:	
RE: ING Life Insurance and Annuity Company	
NAIC #229-86509, FEIN # 71-0294708	
Roth 457 Annuity Endorsement: E-RO457-11	

On behalf of ING Life Insurance and Annuity Company, the above-captioned form is submitted for your review and

SERFF Tracking Number: INGD-126976016 State: Arkansas  
Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 47655  
Company Tracking Number: E-RO457-11  
TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium  
Variable and Variable  
Product Name: E-RO457-11  
Project Name/Number: E-RO457-11/E-RO457-11

approval. It contains no unusual or possibly controversial items from normal company or industry standards. The endorsement is new and does not represent a replacement of any previously approved form.

The endorsement is designed for use with group variable, fixed, or combination annuity contracts which were previously approved by your Department. Form E-RO457-11 endorses the contracts shown on the attached list, as well as any other approved 457 form we may have inadvertently omitted from the list. Additionally, we would like to use the endorsement for future Department approved 457 contracts.

The purpose of endorsement E-RO457-11 is to amend the listed contracts to reflect one of the provisions of the Small Business Jobs Act of 2010, effective January 1, 2011, which permits governmental 457 plans to allow for Roth contributions and rollovers into Roth accounts. In order to update our contracts for these changes, we would like to begin offering this endorsement upon state approval for both new and existing customers.

We have not scored this form for readability as the endorsement is designed to conform to the requirements of a new federal law, and it should be exempt from any readability requirements.

The endorsement will be filed in all jurisdictions where we are licensed to do business.

The endorsement is submitted in final printed form, subject to only minor modification in paper stock, ink, border, company logo, typographical errors, adaptation to computer printing and the possible inclusion of a barcode.

If you have any questions or require any additional information, please do not hesitate to contact me at (860) 580-2801, toll free at (800) 654-8065 or by email at melissa.cheyney@us.ing.com.

## Company and Contact

### Filing Contact Information

Melissa Cheyney, Contract Analyst  
One Orange Way  
Windsor, CT 06095-4774  
Melissa.Cheyney@us.ing.com  
860-580-2801 [Phone]  
860-580-4844 [FAX]

### Filing Company Information

ING Life Insurance and Annuity Company  
One Orange Way  
Windsor, CT 06095  
(800) 654-8065 ext. [Phone]  
CoCode: 86509  
Group Code: 229  
Group Name:  
FEIN Number: 71-0294708  
State of Domicile: Connecticut  
Company Type:  
State ID Number:

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## Filing Fees

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING Life Insurance and Annuity Company	\$50.00	01/07/2011	43535540

SERFF Tracking Number:	INGD-126976016	State:	Arkansas
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TOI:	A02.1G Group Annuities - Deferred Non-Variable and Variable	Sub-TOI:	A02.1G.002 Flexible Premium
Product Name:	E-RO457-11		
Project Name/Number:	E-RO457-11/E-RO457-11		

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	01/14/2011	01/14/2011

<i>SERFF Tracking Number:</i>	<i>INGD-126976016</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Company Tracking Number:</i>	<i>E-RO457-11</i>		
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-RO457-11</i>		
<i>Project Name/Number:</i>	<i>E-RO457-11/E-RO457-11</i>		

## Disposition

Disposition Date: 01/14/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

<i>SERFF Tracking Number:</i>	<i>INGD-126976016</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Product Name:</i>	<i>E-RO457-11</i>		
<i>Project Name/Number:</i>	<i>E-RO457-11/E-RO457-11</i>		

<b>Schedule</b>	<b>Schedule Item</b>	<b>Schedule Item Status</b>	<b>Public Access</b>
<b>Supporting Document</b>	Flesch Certification		Yes
<b>Supporting Document</b>	Application		No
<b>Supporting Document</b>	Life & Annuity - Acturial Memo		No
<b>Supporting Document</b>	Contract List		Yes
<b>Form</b>	Endorsement		Yes

SERFF Tracking Number: INGD-126976016 State: Arkansas

Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 47655

Company Tracking Number: E-RO457-11

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium  
Variable and Variable

Product Name: E-RO457-11

Project Name/Number: E-RO457-11/E-RO457-11

## Form Schedule

Lead Form Number: E-RO457-11

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	E-RO457-11	Policy/Cont Endorsement ract/Fratern al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	E-RO457-11.pdf

## ING Life Insurance and Annuity Company

### ENDORSEMENT

In order to reflect amendments to the Internal Revenue Code ("Code") made pursuant to the **Small Business Jobs Act of 2010**, the Contract is hereby amended by this Endorsement. This Endorsement is part of the Contract to which it is attached. The provisions of this Endorsement supersede any conflicting provisions in the Contract or in any prior endorsements. The purpose of this Endorsement is to amend the Contract to permit Roth after-tax contributions as described in the Code (as amended), if permitted under a Governmental **457(b)** program for which this Contract is issued.

#### **A Participant Roth Account is added to the Contract as follows:**

**Participant Roth Account** - This account will be credited with Net Purchase Payments (or, if applicable, Net Deposits, Net Contributions or Contributions) that represent participant Roth after-tax salary reduction amounts pursuant to Code Section 402A, if any, and the portion of any transfer or rollover (which may include distributions from a Participant's plan account that is rolled over to the Participant's designated Roth account in the same plan) attributable to such amounts. The description of **Individual Account or Participant Account**, if it appears in the Contract to which this Endorsement is attached, is amended to include the Participant Roth Account as described in this paragraph.

**Maintenance Fee/Participant Account Charge (whichever is applicable, if any)** (may also be referred to as a charge assessed on each anniversary of the Individual Account effective date):

We may deduct all or a portion of the Maintenance Fee or Participant Account Charge applicable to the Contract, if any, from the Participant Roth Account.

**Withdrawal Charges (Surrender Fees) if any:** For purposes of the following provision, the term "withdrawal charge" refers to "withdrawal charge" or "surrender fee" as those terms are used in the Contract:

Except as provided below, any withdrawal charge specified in the Contract that is applicable to a withdrawal of amounts attributable to a lump sum payment or an installment payment will apply in the same manner to a withdrawal of amounts attributable to the same type of payment made to a Participant Roth Account.

In the case of a withdrawal charge for a participant installment account that is based on the number of Purchase Payment Cycles or Deposit Cycles (Cycles) completed, the number of Cycles completed for the Participant Roth Account will be determined independently from the number of Cycles completed for any other participant installment account of the participant, with the following exception. At the time we first establish a Participant Roth Account or any other participant installment account for a participant, we will credit the new participant installment account with the same number of Purchase Payments or Deposits as were made, if any, to the existing participant installment account with the greatest number of Purchase Payments or Deposits. After the new participant installment account is established under this paragraph, the number of additional Cycles credited from that point forward to a participant installment account will be based solely on the number of subsequent Purchase Payments or Deposits, if any, made to that particular participant installment account. This could result in a different number of Cycles completed for each participant installment account.

The statement below is added to **Contribution Limits**, as endorsed:

Pre-tax salary reduction contributions and Roth after-tax salary reduction contributions are aggregated for purposes of applying the applicable dollar amount permitted under Code Sections 415 and 457, as applicable.



The description of **Loans** is amended as follows:

Unless specifically permitted by the terms of a plan and supported by the plan's administrator and record keeper, a loan is not available from the Participant Roth Account. Absent such an exception, this means that although the Participant Roth Account may be included in the calculation of the amount available for loan ("leivable"), money from the Participant Roth Account may not be part of a loan ("loanable"). Accordingly, the amount available for a full or partial withdrawal from a Participant Roth Account will not be reduced by any outstanding loan balance. Further, in the event of a loan default, no amount of the outstanding loan balance will be deducted from the Participant Roth Account.

The effective date of this Endorsement is the latest of January 1, 2011, the date the Endorsement is attached to the Contract, or on the effective date of the Contract.



President  
ING Life Insurance and Annuity Company

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## Supporting Document Schedules

Item Status: Status  
Date:

**Satisfied - Item:** Flesch Certification

**Comments:**

Attached is the Certification of Compliance.

**Attachment:**

AR Cert.pdf

Item Status: Status  
Date:

**Satisfied - Item:** Contract List

**Comments:**

Attached is the list of Group Annuity Contracts to be endorsed by RO457-11, as mentioned in the filing description.

**Attachment:**

Contract List.pdf

**STATE OF ARKANSAS**  
**CERTIFICATION OF COMPLIANCE**

CARRIER: ING Life Insurance and Annuity Company

FORM NUMBER(S)

FORM TITLE(S)

E-RO457-11

Endorsement

I hereby certify that to the best of my knowledge and belief the above form submission complies with Rule and Regulation 19s10 as well as all applicable requirements for the State of Arkansas.



\_\_\_\_\_  
Signature of Officer or Representative

Melissa V. Cheyney

\_\_\_\_\_  
Name

Contract Analyst

\_\_\_\_\_  
Title and/or Business Affiliation

January 7, 2011

\_\_\_\_\_  
Date

## ING Life Insurance and Annuity Company

**Endorsement E-RO457-11 will endorse the following Group Annuity Contracts (or a state specific version thereof) if such forms were previously approved by your Department of Insurance. This form will endorse other approved 457 forms inadvertently omitted from the list and future Department approved 457 contracts.**

Group Contract No.
G-CDA(12/99)
G-CDA-10
G-CDA-AFT
GLID-CDA-HO
GID-CDA-HO
GSD-CDA-HO
G-CDA-HD
G-CDA-HF
GA-GOVCC-99
G-FP3-00
G-FP3-01
G-FP3-09
G-FA-01(DC/MS)
GF-PVA-IC